

## OIC Rules Coordinator

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**From:** HORTA, KERI L. <KHORTA@AMICA.COM>  
**Sent:** Thursday, December 5, 2024 6:07 AM  
**To:** OIC Rules Coordinator  
**Cc:** Amica Corporate Compliance Mailbox  
**Subject:** Comments Requested-Washington OIC Proposes Delay in Rulemaking for Premium Change Transparency  
**Attachments:** Publication-Washington-OIC-Proposes-Delay-in-Rulemaking-for-Premium-Change-Transparency.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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### External Email

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Good Morning,

On behalf of Amica Mutual Insurance Company, I am submitting the below comments for CR 101.

- **Number of Consumers who have requested premium change transparency**
  - Since Phase 1 of this regulation has been implemented, we have only received six (6) written requests for explanation. The letters explaining the premium changes are often more confusing for the consumer. We believe the low volume of written requests we have received is attributed to the exceptional account servicing done by our customer service representatives who are able to explain the increase over the phone and it is understood by the consumers.
- **Implementation Challenges**
  - Extremely challenging/ complex to explain premium changes to customers due to multi variant models which consider multiple factors such as marital status and claims history. The models are complex and challenging to unwind.
  - It is often difficult to identify the specific factors driving the change.
  - Customer-Friendly Explanations: It is challenging to identify the root cause of premium variance in simple terms for the consumer, which is difficult given the complexity of the models.

Please let me know if you have any follow up questions. Thank you.

**Keri Horta** | Lead Corporate Compliance Analyst  
Amica Mutual Insurance Company | Corporate Administration  
100 Amica Way | Lincoln, RI | 02865  
Voice: 800-652-6422 ext. 29230  
[khorta@amica.com](mailto:khorta@amica.com) | [Amica.com](https://www.amica.com)



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# Washington OIC Proposes Delay in Rulemaking for Premium Change Transparency

11/01/2024	JURISDICTION(S)	LINE(S) AFFECTED	COMMENTS BY	REGULATION NUMBER
	<b>Washington</b>	<b>Auto--Personal Homeowners</b>	<b>12/20/2024</b>	<b>R. 2024-07</b>

## Overview

The Washington OIC has issued notice that it is starting rulemaking R. 2024-07 to propose a delay to the premium change transparency rule phase two until 2029. The delay would allow the OIC to collect additional data from insurers, consumers, and other interested parties on the effectiveness of the rule's phase one. Comments must be submitted by December 20, 2024.

## Details

The Washington OIC has issued the CR-101 to initiate its rulemaking on premium change transparency. The premium change transparency rules were adopted in 2023 in Chapter 284-30A WAC. See APCIA Adopted Regulation Bulletin [here](#). These adopted rules outlined administrative regulations to achieve transparency for policyholders receiving premium increases from insurers at renewal of insurance policies such as residential property and private passenger auto.

The Insurance Commissioner is proposing rules to delay the implementation date of phase two until 2029. The purpose of the delay is for the Insurance Commissioner to collect additional data from insurers, consumers, and other interested parties on the effectiveness of phase one of the rule, adopted in **WAC 284-30A-050**, including the number of consumers who have requested premium change transparency from their insurer and data on the implementation challenges from insurers as they prepare for phase two. Additional amendments to the phase two requirements will be considered for this rulemaking.

Among other factors, the OIC will look at phase two insurer implementation challenges and the number of consumers who have requested premium change transparency from their insurer. The proposed rule applies to authorized insurers with the following types of personal insurance policies:

- (a) Private passenger automobile coverage; and
- (b) Homeowner's coverage, including mobile homeowners, manufactured homeowners, condominium owners, and renter's coverage.

The premium change transparency rules outlined administrative regulations to achieve transparency for policyholders receiving premium increases from insurers at renewal of insurance policies such as residential property and private passenger auto. The Insurance Commissioner is proposing rules to delay the implementation date of phase two until 2029. The purpose of the delay is for the Insurance Commissioner to collect additional data from insurers, consumers, and other interested parties on the effectiveness of phase one of the rule, adopted in WAC 284-30A-050, including the number of consumers who have requested premium change transparency from their insurer and data on the implementation challenges from insurers as they prepare for phase two. Additional amendments to the phase two requirements will be considered for this rulemaking.

## Comments

The comment period for the CR-101 will begin on **November 1, 2024**, and will close on **December 20, 2024**. Please submit comments to [rulescoordinator@oic.wa.gov](mailto:rulescoordinator@oic.wa.gov).

## Attachment

A copy of the CR-101 is available as an attachment on the APCIA website.

## Related Information



[WA CR-101 to R 2024\\_07 Premium Change Transparency.pdf](#)

## Contacts

### Sheila Williams

Counsel, Compliance Information

📞 847-553-3757

✉ [sheila.williams@apci.org](mailto:sheila.williams@apci.org)

### Mark Sektnan

Vice President, State Government Relations

📞 916-449-1370

✉ [mark.sektnan@apci.org](mailto:mark.sektnan@apci.org)

**555 12th Street, NW, Suite 550  
Washington, D.C. 20004-1200**

**📞 202-828-7100**

**8700 West Bryn Mawr, Suite 1200S  
Chicago, IL 60631-3512**

**📞 847-297-7800**

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